

UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE

UNITED STATES OF AMERICA,

v.

PAUL EFTANG,

Defendant.

CASE NO. 1:23-CR-00069

DEFENDANT'S SENTENCING MEMORANDUM

The defendant, Paul Eftang, by and through undersigned counsel, Paul Charlton, hereby files this sentencing memorandum respectfully requesting the Court impose the parties' agreed-upon sentence, as set forth in his Plea Agreement and stipulated as binding under Fed. R. Crim. P. 11(c)(1)(C), of one year of probation and the imposition of no fine on one count of the strict liability offense of introduction of a misbranded drug into interstate commerce. 21 U.S.C. §§ 331(a) and 333(a)(1).

Mr. Eftang is a dedicated husband, devoted father to his infant son, and business owner. Mr. Eftang maintains a great relationship with his parents and siblings and has had his family's full support throughout this matter. As noted in his Presentence Report prepared by the U.S. Probation Officer, Mr. Eftang has no prior criminal history and has had no occurrences of wrong doing since entering his plea in this Court.

Mr. Eftang joins the Government in requesting the Court impose the sentence set forth in the Plea Agreement filed with this Court.

Dated: January 25, 2024

Respectfully submitted,

/s/ Thomas P. Colantuono

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CERTIFICATE OF SERVICE

I hereby certify that on January 25, 2024 the above document was served electronically upon all counsel of record through the CM/ECF filing system.

/s/ Paul K. Charlton

Paul K. Charlton (AZ Bar No. 012449)